

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

INTERFOCUS INC., A California
Corporation,

Plaintiff,

v.

HIBOBI TECHNOLOGY LTD;
HANGZHOU HIBABY TECHNOLOGY
CO. LTD; HANGZHOU HAIBAOBEI
TECHNOLOGY CO., LTD; HANGZHOU
HIBAO TECHNOLOGY CO., LTD.
HIBOBI HOLDINGS, LIMITED, AND
HANGZHOU JIULONG TECHNOLOGY
CO. LTD.

Defendants..

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**DECLARATION OF ZHENG LIU IN SUPPORT OF PLAINTIFF'S MOTION FOR
ENTRY OF A PRELIMINARY INJUNCTION**

DECLARATION OF ZHENG LIU

I, Zheng Liu, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of California and a number of federal courts. I am one of the attorneys for Plaintiff INTERFOCUS INC. (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. I personally compared the supplier list produced by Defendants counsel and the list suppliers from Plaintiff InterFocus. InterFocus used a total of ten (10) suppliers for the products that are relevant to the Complaint, TRO and Amended Complaint. None of the suppliers matched any of the twelve (12) suppliers from the Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 18th day of November, 2022 at Menlo Park, California.

/S/ Zheng Liu

Zheng Liu
Counsel for Plaintiff, INTERFOCUS INC.